

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re

Case No. 12-46321-ESS

EMMONS-SHEEPSHEAD BAY
DEVELOPMENT LLC,

Chapter 11

Debtor.
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MOTION TO EXTEND TIME IN ORDER TO COMPLETE DISCOVERY

The Law Offices of Alla Kachan, by Alla Kachan, Esq, represents Albert Wilk d/b/a WILK RE, Alex Dikman, and Metropolitan Estates, Inc. (hereinafter, collectively "Metropolitan") are creditors of the debtor in this bankruptcy case. Metropolitan respectfully requests that this Court, pursuant to Rule 9006(b)(1) of the Federal Rules of Bankruptcy Procedure (hereinafter, "FRBP") extend the time allotted for the parties to complete discovery in this case.

A Scheduling Order setting out a discovery schedule for the parties was issued by this court on April 28, 2013. See Scheduling Order, ECF Doc. No. 95. The parties, however, have been in ongoing negotiations to attempt to settle and resolve certain issues and claims. As it now appears settlement of certain claims and issues is highly unlikely, Metropolitan respectfully requests an extension of time to complete discovery in this matter. No previous application for similar relief has previously been made.

WHEREFORE, Metropolitan respectfully requests that this Court grant its motion to extend time for the parties to complete discovery, and for any other and further relief which this Court may deem just and proper.

Dated: Brooklyn, New York
June 25, 2013



Alla Kachan, Esq.

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